

1 **RIKLIS LAW, PLLC**  
KRISTOFER RIKLIS  
2 Nevada Bar No. 14754  
871 Coronado Center Dr., Suite 200  
3 Henderson, NV 89052  
Telephone: (702) 720-6471  
4 [Kristofer@riklistlaw.com](mailto:Kristofer@riklistlaw.com)

5 Attorney for CHRISTOPHER J. HADNAGY and  
SOCIAL-ENGINEER, LLC

6 UNITED STATES DISTRICT COURT  
7  
8 DISTRICT OF NEVADA

9 CHRISTOPHER J. HADNAGY, an  
10 individual; and SOCIAL-ENGINEER, LLC, a  
11 Pennsylvania limited liability company,

12 Plaintiffs,

13 v.

14 JEFF MOSS, an individual; DEF CON  
COMMUNICATIONS, INC., a Washington  
15 corporation; and DOES 1-10; and ROE  
ENTITIES 1-10, inclusive,

16 Defendants.  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Case No.: 2:23-cv-01345-CDS-BNW

**DECLARATION OF KRISTOFER  
RIKLIS, ESQ. IN SUPPORT OF  
PLAINTIFFS' RESPONSE IN  
OPPOSITION TO DEFENDANTS'  
MOTION TO DISMISS THE  
COMPLAINT FOR LACK OF  
PERSONAL JURISDICTION [ECF NO.  
13]**

**DECLARATION OF KRISTOFER RIKLIS, ESQ. IN SUPPORT OF  
PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANTS' MOTIONS TO  
DISMISS THE COMPLAINT FOR LACK OF PERSONAL JURISDICTION  
[ECF NO. 13]**

I, Kristofer Riklis, Esq., declare as follows:

1. I am an attorney duly licensed to practice law in the State of Nevada and am the Owner of Riklis Law, PLLC, counsel of record to Plaintiffs Christopher J. Hadnagy and Social-Engineer, LLC in the above-referenced matter.

2. This Declaration is made in support of Plaintiffs' Response in Opposition to Defendants' Motion to Dismiss for Lack of Personal Jurisdiction only.

3. True and correct printouts of screenshots of the "FAQ" Section of Defendants' Website at <https://defcon.org/html/links/dc-faq/dc-faq.html> (accessed October 15, 2023) are attached hereto as "Exhibit 1."

4. True and correct printouts of screenshots of the "Forums" Section of Defendants' Website at <https://forum.defcon.org> (accessed October 15, 2023) are attached hereto as "Exhibit 2." Clicking on the "Def Con Forums" link on Def Con's "Home" page located on Page 12 leads to Page 13, which shows all the forums for Def Con Planning. Clicking on the "Def Con 31 Planning" link leads to a page with all of the Sub-Forums dedicated to all of Def Con's activities.

5. True and correct printouts of screenshots of the "Book a Room" section of Defendants' Website at <https://defcon.org> (accessed October 15, 2023) are attached hereto as "Exhibit 3." Clicking on the "Book a Room!" link on the "Home" page located on Page 23 leads to Pages 24-25, which shows all the hospitality room blocks reserved for Def Con 2024. Clicking on the date range shows the "Event Dates" as seen on Page 25. Clicking on "Search" brings up the various hotel options seen on pages 26-30.

6. True and correct printouts of screenshots of the link to the "Open Calls" and Style Guide Section of Defendants' Website at <https://defcon.org> (accessed October 15,

2023) are attached hereto as “Exhibit 4.” Clicking on the “Open Calls” link on the “Home” page located on Page 33 leads to Page 34, which shows all the different “Calls” applicable to the Event. For example, Clicking on the “Call for Exhibitors” provides real-time information as to the acceptance period of the calls and provides in-depth information on how to contribute in various methods at the Event on Pages 35-38.

7. True and correct printouts of screenshots of the link to the “Recent News” Section of Defendants’ Website at <https://defcon.org/html/links/dc-news.html> (accessed October 15, 2023) are attached hereto as “Exhibit 5.”

8. True and correct printouts of screenshots of the link to the “Get Involved” Section of Defendants’ Website at <https://defcon.org/html/links/get-involved.html> (accessed October 15, 2023) are attached hereto as “Exhibit 6.”

9. Each page of Defendants’ website at [www.defcon.org](http://www.defcon.org) bear a copyright notation of either “© 1992-2023 Def Con Communications, Inc. All Rights Reserved” or “(r) DEF CON Communications, Inc. and each screenshot exhibits the related URL. These are included on the last page of the exhibits.

DATED: June 23, 2023

/s/ Kristofer Riklis  
Kristofer Riklis

**INDEX OF EXHIBITS**

<b><u>Exhibit</u></b>	<b><u>Title</u></b>	<b><u>Page Numbers</u></b>
1	Def Con Website: FAQ Section	01-10
2	Def Con Website: Forums Section	11-20
3	Def Con Website: Hotel Room Block	21-31
4	Def Con Website: Open Calls and Guide	32-39
5	Def Con Website: Def Con Cancelled	40-42
6	Def Con Website: Get Involved	43-45

**CERTIFICATE OF SERVICE**

I, Kristofer Riklis, hereby certify that the foregoing:

**DECLARATION OF KRISTOFER RIKLIS, ESQ. IN SUPPORT OF  
PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION TO  
DISMISS THE COMPLAINT FOR LACK OF PERSONAL JURISDICTION [ECF  
NO. 13].**

was submitted electronically for filing and/or service with the United States District Court, District  
of Nevada's e-filing system on the 16th day of October, 2023. Electronic service of the foregoing  
document was be made in accordance with the E-Service List as follows:

Robert J. Cassity  
Erica C. Medley  
**Holland & Hart LLP**  
9555 Hillwood Drive, 2nd Floor  
Las Vegas, NV 89134  
bcassity@hollandhart.com  
ecmedley@hollandhart.com  
*Attorneys for Defendants*

David A. Perez  
**Perkins Coie LLP**  
1201 Third Avenue, Suite 4900  
Seattle, WA 98101-3099  
dperez@perkinscoie.com  
*Attorneys for Defendants*

Matthew J. Mertens  
**PERKINS COIE LLP**  
1120 N.W. Couch Street 10th Floor  
Portland, OR 97209-4128  
mmertens@perkinscoie.com

I further certify that I served a copy of this document by mailing a true and correct copy thereof,  
postage prepaid, addressed to: N/A

/s/ Kristofer Riklis  
KRISTOFER RIKLIS, Esq.